

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Use of Spectrum Bands above 24 GHz For Mobile Radio Services	)	GN Docket No. 14-177
	)	
	)	
Establishing a More Flexible Framework to Facilitate Satellite Operation in the 27.5-28.35 GHz and 37.5-40 GHz Bands	)	IB Docket No. 15-256
	)	
	)	
Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band	)	RM-11664
	)	
	)	
Amendment of Parts 1, 22, 24, 27, 80, 90, 95 and 101 To Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Radio Services	)	WT Docket No. 10-112
	)	
	)	
Allocation and Designation of Spectrum Fixed-Satellite Services in the 37.5-38.5 GHz, 40.5-41.5 GHz, and 48.2-50.2 GHz Frequency Bands; Allocation of Spectrum to Upgrade Fixed and Mobile Allocations in the 40.5-42.5 GHz Frequency Band; Allocation of Spectrum in the 46.9-47.0 GHz Frequency Band for Wireless Services; and Allocation of Spectrum in the 37.0-38.0 GHz and 40.0-40.5 GHz for Government Operations	)	IB Docket No. 97-95
	)	

**REPLY COMMENT OF SOM1101 LLC**

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Manager

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January 23, 2018

## **COMMENT OF SOM1101 LLC**

SOM1101 LLC (“SOM1101”) hereby files this comment in response to the Commission’s *Further Notice of Proposed Rulemaking* (“*FNPRM*”) seeking comment on proposed rules that would authorize mobile operations in additional spectrum bands above 24 GHz. Specifically, the Commission should remove the prohibition on satellite end-user equipment in the 37.5-40 GHz band. Such equipment would only exist on a co-primary, non-interference basis. The wireless industry’s general concern of “unpredictable interference” is unfounded, and any such concerns will be alleviated and appropriately addressed by appropriate modeling and testing.

Respectfully submitted,

/s/ Ryan B. Gardner

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